

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

MARIA IVETTE ORTIZ RIVERA

DEBTOR

CASE NO. 14-00792-BKT

CHAPTER 13

APPLICATION FOR AUTHORIZATION TO RETAIN COUNSEL

TO THE HONORABLE COURT:

COMES NOW, MARIA IVETTE ORTIZ RIVERA, debtor in the above captioned case, through the undersigned attorney, and respectfully states and prays as follows:

1. Debtor filed the instant case on February 5, 2014.

2. Debtor desires and requires the employment of Carlos J. Correa Ramos, Esq. as counsel in order to continue to litigate an action commenced in state court by debtor against *Mapfre/Praico Ins. Co.; Juan I. Lopez Malave; Demandados Desconocidos A, B, C.; Aseguradoras X, y Z*, and also to litigate possible claims against that defendant(s) and /or any insurance agencies.

3. Debtor believes that because Carlos J. Correa Ramos, Esq. has already been litigating in debtor's representation in this Civil action brought by debtor, it would be in the best interest of all parties that he continues representing debtor in matter related to *Maria I. Ortiz Rivera; Corporacion del Fondo del Seguro del Estado Vs. Mapfre/Praico Ins. Co.; Juan I. Lopez Malave; Demandados Desconocidos A, B, C.; Aseguradoras X, y Z* [Civil Case No. H SCI 2012-00561]. Debtor feels that Carlos J. Correa Ramos, Esq. is qualified to render the foregoing services.

4. The professional services that Carlos J. Correa Ramos, Esq. would perform are summarized as follows:

- a) To prepare motions, pleading, orders, adversary proceedings, and other legal documents necessary in the litigation of any claims in favor of debtor.
- b) To represent debtor in any negotiations with defendant or any insurance agencies.
- c) To render legal counseling, legal opinions, prepare legal documents when deemed necessary and/or advisable, as these may relate to any claims initiated against defendant and/or any insurance agencies or in favor of debtor.

Page -2-

Application for Authorization to Retain Counsel
Case No. 14-00792-BKT13

5. Based upon the Declaration attached hereto and marked as Exhibit #1, debtor believes that said Carlos J. Correa Ramos, Esq. does not hold or represents any interest adverse to the debtor or the debtor's estate and is a disinterested person within the meaning of 11 U.S.C. §101(13); and to the best of debtor's knowledge, he is not related or otherwise connected with the debtor, debtor's counsel or the United States Trustee, or any person employed by the Office of the United States Trustee, or any other party in interest.

6. Debtor has been informed that the normal billing rate of said attorney in this case is 33% of the proceeds ("contingency basis"). Debtor discussed with Carlos J. Correa Ramos, Esq. his availability to be employed as special counsel in this case and to perform the services required.

7. Carlos J. Correa Ramos, Esq. represented debtor prior to the bankruptcy petition, and no claim is being made against the estate for prior services and there are no outstanding bills or invoices to be paid to him.

8. Carlos J. Correa Ramos, Esq. also discloses that he has no agreement to share compensation or reimbursement to be received in this case with any person or entity.

WHEREFORE it is respectfully requested that debtor be authorized to employ Carlos J. Correa Ramos, Esq. as counsel, to render the services as described in the foregoing application, with compensation to be paid at the end of the civil case.

I HEREBY CERTIFY that a copy of this motion has been sent to creditors and all parties in interest as per matrix attached; also to the Chapter 13 Trustee and to the US Trustee.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 29 day of April, 2014.

/s/ Carlos J. Correa Ramos
CARLOS J. CORREA RAMOS
#1 MUÑOZ RIVERA
NAGUABO, PR 00718
PO BOX 546 NAGUABO, PR 00718
TEL & FAX NO (787)874-2487

/s/ Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA-CARRASQUILLO
USDC-PR #203614
PO BOX 186 CAGUAS, PR 00726
TEL NO (787)744-7699
FAX NO (787)746-5294

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE

MARIA IVETTE ORTIZ RIVERA

CASE NO. 14-00792-BKT

DEBTOR(S)

CHAPTER 13

DECLARATION

I, Carlos J. Correa Ramos, Esq., declare:

1. That I am an attorney duly admitted to practice before the Courts of the Commonwealth of Puerto Rico.
2. That I am the attorney for debtor in Civil Case No. H SCI 2012-00561 *Maria I. Ortiz Rivera; Corporación del Fondo del Seguro del Estado Vs. Mapfre/Praico Ins. Co.; Juan I. Lopez Malave; Demandados Desconocidos A, B, C; Aseguradoras X, Y, y Z*, brought by debtor, and I am the attorney debtor is seeking to employ by the application to which this Declaration is attached as Exhibit #1.
3. That I have experience in general civil law and civil litigation and I am qualified to represent debtor as counsel, and I am willing to accept employment on the basis set forth in the annexed application.
4. That my office is located at #1 Munoz Rivera, Naguabo PR 00718.
5. That to the best of my knowledge I hold no interest adverse to the above entitled estate and I am a disinterested person as defined in 11 U.S.C. §101(13), nor am I, to the best of my knowledge, related or otherwise connected with debtor, the United States Trustee, debtor, the United States Trustee, debtor's counsel or any person employed by the Office of the United States Trustee other party in interest.

Maria I. Ortiz Rivera
Case No.: 14-00792-BKT
Page -2-

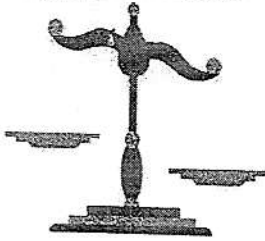
6. That there is no agreement to share any compensation or reimbursement to be received by any person or entity. 11 U.S.C. §504.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 29 day of April, 2014.


CARLOS J. CORREA RAMOS, ESQ
RUA #4593
PO Box 546
NAGUABO PR 00718
TEL/FAX. (787)874-2487
EMAIL: cjcorrea@prtc.net



CARLOS J. CORREA RAMOS

Abogado Notario

Correo electrónico: cjcorrea@prtc.net

PO Box 546 Naguabo, Puerto Rico 00718-0546 Teléfono y Fax: (787) 874-2487

CURRICULUM VITAE

I. Personal circumstances:

Name: Carlos J. Correa Ramos

Parentes: Víctor Correa Pagán/ Angelina Ramos García, both deceased

Civil status: Single - have two children, both of legal age.

Current address: PO Box 546
Naguabo, Puerto Rico 00718-0546

Physical address: M-13 15th Street
Urb. Ramón Rivero
Naguabo, Puerto Rico 00718-0546

II. Education:

High School: Graduated from José M. Gallardo High School at Juncos Puerto Rico in 1960.

University: BBA Degree from University of Puerto Rico in 1968.

JD Degree from University of Puerto Rico in 1974.

Courses towards MBA Degree at Universidad del Turabo.

III. Military Service:

US ARMY From 1960 to 1963

III. Job Experience:

1968 - 1970 Administrative Assistant at Procter and Gamble Commercial Company.

1970 - 1974 Administrative and Accounting work at University of Puerto Rico.

1974 - Present: Lawyer and Notary Public with Law Offices in Naguabo,

Puerto Rico, General Practice.

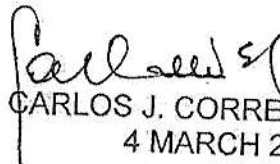
1990 - 1998: Lecturer at Universidad del Turabo.

III. Professional Associations:

Colegio de Abogados de Puerto Rico

Sociedad Puertorriqueña de Genealogía

Asociación de la Familia Correa :


CARLOS J. CORREA RAMOS
4 MARCH 2014

Label Matrix for local noticing
0104-3
Case 14-00792-BKT13
District of Puerto Rico
Old San Juan
Tue Apr 29 15:36:37 AST 2014

RELIABLE FINANCIAL SERVICES
PO BOX 21382
SAN JUAN, PR 00928-1382

US Bankruptcy Court District of P.R.
Jose V Toledo Fed Bldg & US Courthouse
300 Recinto Sur Street, Room 109
San Juan, PR 00901-1964

Asociacion De Empleados De Gobierno
PO Box 70199
San Juan, PR 00936-8199

Asociacion de Empleados de Ela
PO Box 70290
San Juan, PR 00936-8290

BANCO POPULAR DE PR
Prestamo Hipotecario
PO Box 362708
San Juan, PR 00936-2708

Chld/cbna
PO Box 6497
Sioux Falls, SD 57117-6497

Coop A/C Yabucoena y/o Yabucoop
Sistema De Retiro
PO Box 1
Yabucoa, PR 00767-0001

DTOP
PO Box 41269 MINILLAS STATION
SAN JUAN, PR 00940-1269

Fondo Coop
Minillas Sta PO BOX 42006
San Juan, PR 00940-2006

Gecrb/JC Penney PR
PO Box 965007
Orlando, FL 32896-5007

Gladymir Lopez Rodriguez
HC 04 Box 4088
Humacao, PR 00791-8907

(p)CITIBANK
PO BOX 790034
ST LOUIS MO 63179-0034

Radio/cbna
PO Box 6497
Sioux Falls, SD 57117-6497

Sears Credit Cards
PO Box 183081
Columbus, OH 43218-3081

Sears/Cbna
PO Box 6283
Sioux Falls, SD 57117-6283

Sistema De Retiro
PO Box 42003
San Juan, PR 00940-2203

JOSE RAMON CARRION MORALES
PO BOX 9023884
SAN JUAN, PR 00902-3884

MARIA IVETTE ORTIZ RIVERA
PO BOX 1206
YABUCOA, PR 00767-1206

MONSITA LECAROS ARRIBAS
OFFICE OF THE US TRUSTEE (UST)
OCHOA BUILDING
500 TANCA STREET SUITE 301
SAN JUAN, PR 00901

ROBERTO FIGUEROA CARRASQUILLO
PO BOX 186
CAGUAS, PR 00726-0186

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Radio Shack
PO Box 183015
Columbus, OH 43218-3015

(d)The Children's Place Plan
PO Box 183015
Columbus, OH 43218-3015

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)RELIABLE FINANCIAL SERVICES, INC.

End of Label Matrix

P.O. BOX 21382

Mailable recipients 20

SAN JUAN, PR 00928-1382

Bypassed recipients 1

Total 21